

CRUSER, MITCHELL, NOVITZ, SANCHEZ, GASTON & ZIMET, LLP

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SINOWA JOHNSON,

Plaintiff,

v.

NJ TRANSIT BUS OPERATIONS INC. d/b/a/
NJ TRANSIT AND ATU LOCAL 880,

Defendants.

Hon. Karen M. Williams, U.S.D.J.
Hon. Elizabeth A. Pascal, U.S.M.J.

Civil Action No. 1:25-02528 (KMW/EAP)

DECLARATION OF COUNSEL

Travis M. Anderson, of full age, having been duly sworn according to law, do of my own personal knowledge, make the following statements by way of declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am licensed to practice law in the State of New Jersey and admitted to practice law before the United States District Court for the District of New Jersey.
2. I am an Associate Attorney at the law firm of Cruser, Mitchell, Novitz, Sanchez, Gaston & Zimet, LLP, attorneys for Defendant, NJ Transit Bus Operations, Inc. (“Defendants”), in the above-captioned matter. I submit this Declaration of Counsel in support of Defendant’s motion to dismiss Plaintiff, Sinowa Johnson’s (“Plaintiff”) Complaint, with prejudice, for failure to state a claim and lack of subject matter jurisdiction, pursuant to Rule 12(b)(6) and Rule 12(b)(1) of the Federal Rules of Civil Procedure.

3. Attached hereto as **Exhibit A** is a true and accurate copy of Plaintiff's Complaint.

4. Attached hereto as **Exhibit B** is a true and accurate copy of the unpublished opinion in Pue v. New Jersey Transit Corp., 22-2616, 2023 WL 2930298 (3d Cir. Apr. 13. 2023).

5. Attached hereto as **Exhibit C** is a true and accurate copy of the unpublished opinion in Local 54 Patrolman's Benevolent Association v. Fontoura, No. 06-6278, 2007 WL 4165158, (D.N.J. Nov. 19, 2007).

I certify under the penalty of perjury that the foregoing statements are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Travis M. Anderson

Travis M. Anderson, Esq.

Dated: June 2, 2025